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Attorneys for The Trustees of Columbia University in the City of New York

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: COLUMBIA COLLEGE RANKINGS
ACTION

This Document Relates To:

All Actions.

Case No. 1:22-cv-05945-PGG

(Consolidated with Case No.
1:22-cv-06567-PGG)

**DECLARATION OF AASIYA F. MIRZA GLOVER IN SUPPORT OF DEFENDANT’S
MOTION TO DISMISS THE PUTATIVE CLASS ACTION COMPLAINT**

Aasiya F. Mirza Glover, hereby declares as follows:

1. I am an attorney at law, duly admitted to practice in the state of New York and in the Southern District of New York.

2. I am associated with the law firm of Debevoise & Plimpton LLP (“Debevoise”), counsel of record for Defendant The Trustees of Columbia University in the City of New York in the above-captioned matter. I make this declaration based on personal knowledge and reasonable investigation.

3. The document attached as **Exhibit A** is a website capture of a post by Professor Michael Thaddeus, cited at footnote five in Plaintiffs’ Consolidated Class Action Complaint, and titled *An Investigation of the Facts Behind Columbia’s U.S. News Rankings* (dated March 20, 2022). I directed a member of Debevoise’s litigation team to preserve this webpage, at

<https://www.math.columbia.edu/~thaddeus/ranking/investigation.html>. The Debevoise employee created and transmitted to me the electronically preserved version of the webpage, which I reviewed and determined was a true and correct copy of this website post.

4. The document attached as **Exhibit B** is a website capture of a post by Robert Morse and Eric Brooks, cited at footnote three in Plaintiffs' Consolidated Class Action Complaint, and titled *A More Detailed Look at the Ranking Factors* (dated Sept. 12, 2021). This post was accessed on September 29, 2022 as a snapshot which had been preserved on September 13, 2021 by the Wayback Machine Internet Archive¹ and located at <https://web.archive.org/web/20210913033845/https://www.usnews.com/education/best-colleges/articles/ranking-criteria-and-weights>. I directed a member of Debevoise's litigation team to preserve this website post. The Debevoise employee created and transmitted to me the electronically preserved version of the webpage, which I reviewed and determined was a true and correct copy of this website post.

5. I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 10th day of February, 2023, in New York, New York.

/s/ Aasiya F. Mirza Glover

Aasiya F. Mirza Glover

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¹ See *United States v. Gasperini*, 894 F.3d 482, 490 (2d Cir. 2018) (affirming that screenshots taken by the Wayback Machine constitute admissible evidence).